Scope Misalignment Nevada Assessed IT Service Provider Suspension Compliance

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Part 1. Currency as Institutional Condition

The currency of the Active FCI Posture Record, understood as the continuous requirement that documentation reflect the FCI boundary as it exists at each point of assessment under DFARS 252.204-7012, presents as either maintained or unmaintained for WOSB-designated contractors in Nevada whose IT service provider relationships have changed since the record was last confirmed. Where an organization's relationship with a managed service provider, cloud infrastructure vendor, or IT support contractor has been initiated, modified, or terminated, the FCI boundary has changed in ways that the documentation either addresses or does not address. The record is current or it is not current at the point of review. Ongoing assessment activity within this procurement environment observes the record as it presents and does not reconstruct the history of provider relationship changes to locate the point at which the record became unmaintained. The observation occurs at the present point. The record either carries the current configuration or it carries an earlier one.

Organizations within the same set-aside classification at equivalent thresholds present records where IT service provider changes have occurred and the documentation that described the prior provider relationship remains in the record without reflecting the current relationship. The record contains both the documentation that addressed the prior provider and the operational reality of the current provider, and the two conditions coexist within the same assessment surface without resolving. Both conditions remain present across the interval. The currency of the record with respect to the IT service provider domain is maintained or unmaintained. The condition is binary. There is no intermediate state in which the record partially reflects the current provider relationship.

Part 2. Provider Transitions and FCI Boundary Coverage

WOSB-designated contractors in Nevada whose IT service provider transitions involved changes to the systems, access pathways, or data storage locations within the FCI boundary present a record condition in which the documentation either covers the current boundary as it exists under the new provider relationship or it covers the boundary as it existed under the prior relationship. Documentation either covers the current boundary or it lapses at that edge. The transition from one provider to another may have altered which systems fall within the FCI boundary, which personnel have access to Federal Contract Information, and which infrastructure components process or store that information. The documentation produced before the transition describes the pre-transition boundary. The boundary as it exists after the transition is the boundary that ongoing assessment activity within this procurement environment assesses the record against.

Where the provider transition introduced new systems into the FCI boundary that the prior provider did not operate, the documentation does not address those systems. Where the transition removed systems from the boundary, the documentation may describe systems that no longer participate in FCI processing. Neither condition displaces the other in the record. The documentation and the operational environment both exist. They do not correspond. Organizations within the same set-aside classification at equivalent thresholds whose provider transitions altered the system architecture within the FCI boundary present records in which the documentation describes an environment that the current provider does not operate, and in which the environment the current provider operates is not described in the documentation. The record is either current or inactive with respect to the present boundary. The condition is observable without external reference.

Part 3. Ongoing Provider Relationships and Documentation Maintenance

WOSB-designated contractors in Nevada whose IT service provider relationships have not changed but whose providers have modified the systems, configurations, or access structures that fall within the FCI boundary present a documentation condition that differs in origin from a provider transition but produces the same binary outcome: the record is maintained or it is unmaintained. Where the existing provider has upgraded systems, migrated workloads, changed access control configurations, or modified the infrastructure that processes Federal Contract Information, the FCI boundary has changed even though the provider relationship has not. Documentation either reflects present conditions or it reflects conditions that have since changed. Ongoing assessment activity within this procurement environment does not distinguish between boundary changes caused by provider transitions and boundary changes caused by provider-initiated modifications within an existing relationship. The observation is the same. The record either addresses the current boundary or it does not.

Organizations within the same set-aside classification at equivalent thresholds whose IT service providers have made infrastructure modifications present records where the documentation describes the pre-modification environment, and the operational environment reflects the post-modification state. The two findings coexist in the record as currently configured. The record's coverage of the FCI boundary as it exists following the modification is either maintained or unmaintained. Where it is unmaintained, the record carries documentation whose currency has not been confirmed within the current assessment interval. The documentation describes a boundary that the provider's modifications have changed. The condition is binary. The record presents as maintained or it presents as unmaintained at the point of assessment.

Part 4. Self-Qualification and Maintained Record Condition

An organization whose Active FCI Posture Record presents as maintained with respect to IT service provider relationships demonstrates documentation in which the current provider's systems, access configurations, and infrastructure components are described within the FCI boundary documentation, the documentation reflects the most recent

configuration of the provider's environment, and the record produces structured output that corresponds to the operational boundary as it exists at the point of assessment. Both are observable within the same assessment surface. The documentation and the environment correspond. Ongoing assessment activity within this procurement environment observes this correspondence or its absence. Where the record does not demonstrate this correspondence, the documentation is unmaintained with respect to the IT service provider domain. Organizations within the same set-aside classification at equivalent thresholds present records where the maintained and unmaintained states are both present across the population. The gap and the posture are both present in the current observation. The record is maintained. Or it is not maintained. The assessment does not produce a third outcome.